

316-8-57

Stenographic Transcript Of

HEARINGS

Before The

SUBCOMMITTEE ON AIR AND WATER POLLUTION

COMMITTEE ON PUBLIC WORKS

UNITED STATES SENATE

A BILL TO AMEND THE CLEAN AIR ACT, AS AMENDED,

AND FOR OTHER PURPOSES

Washington, D. C.

JULY 28, 1970

Alderson Reporting Company, Inc.

Official Reporters

300 Seventh St., S. W. Washington, D. C.

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EXECUTIVE SESSION1
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A BILL, TO AMEND THE CLEAN AIR ACT, AS AMENDED,

AND FOR OTHER PURPOSES

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TUESDAY, JULY 28, 1970

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United States Senate,

Subcommittee on Air & Water Pollution of
the Committee on Public Works,

Washington, D. C.

The subcommittee met at 2:35 p.m., pursuant to notice,
in room 4200, New Senate Office Building, Senator Edmund S.
Muskie (chairman of the subcommittee) presiding.

Present: Senators Muskie, Bayh, Spong, Boggs, Cooper
and Baker.

Staff Members Present: Richard B. Royce, Chief clerk
and staff director; Bailey Guard, assistant chief clerk,
minority; M. Barry Meyer, counsel; Thomas C. Jorling, minority
counsel; Leon G. Billings, professional staff member; Richard D.
Grundy, professional staff member; Stewart E. McClure, professional
staff member; and Phillip Cummings, professional staff member.

Senator Muskie. We will be in order.

Senator Boggs. As the first order of business, Mr. Chairman,
I would like to, if I may --- I made a little informal speech ---
on the mission I had undertaken to see Senator Javits and
Senator Gurney to have the two amendments to the Solid Wastes

1 Bill on the Calendar and if they would withhold in offering
2 their amendments and let us pass a bill on the Calendar, we could
3 get into conference with this.

4 So I talked to both of them. They are considerate, and see
5 the need, but Senator Javits said would I get back. He did say,
6 "Will you give me immediate hearings?" And I said "Well, I
7 will have to see. I am going to an Executive Session of the
8 Committee right now" and I suppose "immediate" means sometime
9 in the reasonably near future.

10 I went to Senator Gurney, and he, along the same line,
11 would consider withholding his amendment, and he would like
12 to have hearings, plus the fact that after the hearings, assuming
13 that the hearings make a very good justification for his
14 position, that the committee would even go so far as to consider
15 it, realizing we can't find any member against it, but assuming
16 we could hear it.

17 It may not get to the House and become law in time, but
18 the subcommittee would consider it, and the full committee,
19 and maybe the Senate, at least if the hearings justify it on
20 the record.

21 So I said, "Well, I am going to the executive session
22 of the Subcommittee and talk to the chairman, and see what
23 they can suggest, how far they are willing to go. So it is
24 a matter of hearing primarily.

25 Senator Muskie. Well, there is no way of getting hearings

1 in August unless somebody else chairs. I have no objection
2 to it in principle.

3 Senator Boggs. If you would want to consider it that way,
4 and if we can have hearings and if the staff would take time
5 to help line up the government people, I would make it my
6 business to assist Gurney and Baker and maybe Eagleton. I think
7 that is our only way.

8 Senator Muskie. Why don't we tell them we will do our
9 best to have hearings? We have to check with members.

10 Mr. Royce. It might be after Labor Day, because we would not
11 be able to get it under unanimous consent.

12 Mr. Billings. Besides, the House won't be in session,
13 and we can't have a conference.

14 Senator Muskie. Why don't you tell him that we will
15 schedule hearings, that we will try to do it in August, but
16 it may be September?

17 Senator Boggs. Okay. That may work. I know it will work.
18 I am sure it will with Senator Javits.

19 Senator Muskie. We have got about an hour, so what would
20 the staff like us to focus on?

21 Mr. Billings. Starting on page 19, Mr. Chairman, admission
22 standards for these substances, what I have just distributed
23 is an outline of what we hope to accomplish in section 113(a).
24 There was some concern as to whether the language expressed
25 that purpose.

1 Senator Muskie. You mean this little page here is what
2 you have just distributed?

3 Mr. Billings. Yes, If I could describe that.

4 Senator Muskie. Do you want us to read this, or is it
5 too long?

6 Mr. Billings. I would say, if I could just explain the
7 substitute language for 113(a), and then you may want to read
8 the definition in (b).

9 Senator Muskie. All right.

10 Mr. Billings. the intent of 113 is to provide the Secretary
11 with a short cut method to get at extremely hazardous pollutants,
12 rather than going through the standard procedure. What the
13 Secretary would be required to do if he found on the basis of
14 material evidence that a pollutant was hazardous as defined,
15 he would publish his intent to prohibit the discharge of that
16 pollutant, and he would hold hearings, and unless he found on
17 the basis of the preponderance of the evidence that the level
18 should be zero, he would prohibit it.

19 If he could allow greater than zero to be emitted, he would
20 publish a standard for that pollutant.

21 Senator Muskie. Let me read subsection (b), then.

22 "For the purposes of this section, a hazardous
23 air pollution agent is one whose presence, chronically or inter-
24 mittently, in minor concentrations in ambient air, either
25 alone or in combination with other agents, causes or will cause

1 or contributes to an increase in mortality or an increase in
2 serious irreversible damage to health."

3 Whose definition is that?

4 Mr. Billings. This is a product of a good deal of consul-
5 tation between the staff and the Administration in trying
6 to get it as tight as possible. It is on page 20, paragraph
7 (b).

8 Senator Muskie. What specific pollutants would we cover?

9 Mr. Billings. Do we have a list of them, Tom?

10 Mr. Jorling. Yes. The Administration suggested that can-
11 didates for such substances would be included, and would include
12 polymer organic particulate matter, asbestos, radioactive
13 materials, pesticides, chlorinated hydrocarbon, cadmium, arsenic,
14 lead, manganese, beryllium, chromium, nickel, biological aerosols,
15 chlorine hydrochloric acid, and aerallergens.

16 In the first go around we suggested their commitment to
17 these, simply promulgated these in the statute and listing these
18 as the kinds of substances. They had second thoughts and said
19 some of these probably would not fit that category and would
20 probably restrict it to things of the nature of beryllium,
21 arsenic, and would exclude lead.

22 Senator Muskie. In other words, lead does not constitute
23 a threat to an increase in mortality or a threat to serious
24 damage to health as far as the present knowledge is concerned?

25 Mr. Jorling. I am not speaking with a great deal of assurance

1 about that specifically, but they did suggest that we should
2 not list (b).

3 Substances in the statute, because we were not quite
4 sure enough about some of them.

5 Senator Muskie. What about the report?

6 Mr. Jorling. In the report, I think we have to specify
7 the kinds.

8 Senator Muskie. Would you divide those into more than
9 one category, or classify them as the same in the report?
10 Should we indicate the degree of probability that they would
11 cover?

12 Mr. Jorling. We have asked them to take another look
13 at this list and to make a judgment as to which they would consider
14 to be treated as hazardous substances.

15 Mr. Billings. Beryllium is clearly identified as health
16 hazard pollutants. There are others, such as radiation, on which
17 greater than zero could be permitted.

18 But you would want to be careful.

19 Senator Muskie. What about radiation, what effect would
20 that have on the new environmental protection agency reorganization
21 plans.

22 Mr. Billings. If this authority was put in this law,
23 this would enhance the authority of the new environmental
24 protection agency as described in the reorganization plan proposed

25 There are some other things in the wings that might

1 affect that but this would add to the authority that the
2 President has intended for them to have under the reorganization
3 plan.

4 Senator Muskie. Would this, for instance, give the
5 Environmental Protection Agency the authority to close down
6 a nuclear power plant?

7 Mr. Billings. Yes, sir.

8 Senator Muskie. It would?

9 Mr. Billings. Yes, sir, if under the tests set forth
10 in the law they could find that there was an increase in mor-
11 tality or an increase in serious or irreversible damage to
12 health.

13 Senator Muskie. This could result in a division of opinion
14 between the AEC and the EPA on that point.

15 Mr. Billings. Yes.

16 Senator Muskie. In that case, with this on the books,
17 who would prevail, this one?

18 Mr. Billings. Yes, because the AEC would not under the
19 reorganization plan have radiation standards. Those radiation
20 standards would be transferred.

21 Mr. Royce. Is radiation in the list you have there?

22 Mr. Jorling. They have listed radioactive materials
23 as a substance that would be considered as a candidate under
24 this.

25 Mr. Royce. You are not suggesting zero radiation.

1 Mr. Billings. No. That is why the procedure allows
2 for an emission greater than zero.

3 Mr. Royce. Is six months necessary?

4 Senator Muskie. Six months?

5 Mr. Royce. Between identification and the public hearing?
6 If, within six months after the public hearing?

7 Senator Muskie. It could be a week --- within six months.

8 Mr. Jorling. There are some stationary sources that would
9 have a considerable amount of difficulty in setting a standard
10 for, and radiation would be one of them, because there are
11 radiation emissions from fossil fuels generators, as well
12 as nuclear generators that would have to be considered as
13 far as setting the standard, where as beryllium is I think there
14 are only six manufacturers of beryllium across the country,
15 so that could be done expeditiously.

16 But for substances that would fall within this category,
17 asbeston, for example, that comes out in many different
18 products.

19 Senator Muskie. The definition "minute concentrations"
20 does the word "minute" does that potentially exclude hazardous
21 substances?

22 They might be something more than minute, but still hazardous
23 and ---

24 Senator Baker. "Minute" is not restrictive.

25 Senator Muskie. If it spreads over a metropolitan area,

1 it is not minute.

2 Senator Cooper. A substance where even a minute quantity
3 creates a hazard.

4 Senator Baker. In that same vein, I am also concerned
5 about the use of the word "irreversible" because I can think
6 of physiological injury which might be reversible, but which
7 we would want to guard against at the same time.

8 Senator Muskie. What about the word "irreversible"? Is
9 that a must?

10 Mr. Billings. We could use "increased morbidity or
11 irreversible damage."

12 Mr. Jorling. At one time, it was suggested in the series
13 "incapacitating." It might be reversible.

14 Mr. Grundy. The word "morbidity" would include that
15 category.

16 Mr. Jorling. Oh, I see what you mean.

17 Senator Muskie. It is suggested we add the word
18 "morbidity" in order to cover the point Howard made. Is there
19 agreement on that?

20 Mr. Billings. The staff did not understand that.

21 Senator Cooper. If the Secretary finds these hazardous
22 without hearings, if there is material evidence for him to
23 find that this is this kind of hazardous substance ---

24 Mr. Billings. He would then publish his intent to
25 prohibit, and that would trigger the public hearings.

1 Senator Cooper. And if there are those that are claiming
2 exceptions ---

3 Mr. Billings. Then he would promulgate an emissions
4 standard.

5 Senator Muskie. How about the word "Minute"? Does the
6 staff have guidance on that?

7 Mr. Billings. The staff was trying to narrow this.
8 There are pollutants such as carbon monoxide, which in major,
9 large concentrations in the ambient air will increase morbidity.
10 We are not trying to hit those kinds of pollutants. We are
11 trying to hit what are basically identified as trace elements,
12 those pollutants for which quality standards would either
13 not be adequate method, or would not be a quick enough method.

14 Sometimes it is a matter of degree. Somewhere there will be
15 a point where ---

16 Senator Muskie. In other words, what you want is
17 a more precise instrument for getting quickly at really hazardous
18 pollutants, and if you broaden this coverage too much, it
19 ceases to be precise.

20 Mr. Guard. We are not talking here, I take it, about
21 .001 parts per million, which we are arguing with in our
22 ambient air quality standards for other types of things. I
23 suppose now we are talking about things that are toxic and
24 increase mortality at the lesser concentrations than that.

25 So even in the very minute quantities, these are dangerous,

1 and in this case you would say, "No emissions, no trace, nothing
2 you can find with any instruments."

3 Mr. Billings. Most of these pollutants would not be
4 measurable in the ambient air. You would know they are there,
5 because they come out of the stack, but there would be no way
6 of controlling them once they got out.

7 So an ambient air quality standard might not even be
8 applicable.

9 Senator Boggs. Do you have one in mind right now that
10 would be sort of publicly recognized if you mentioned it?

11 Mr. Billings. Berlyium, asbestos.

12 Senator Muskie. Would you run into trouble on some of
13 these, if they are measurable and ambient air quality standards,
14 but still also sufficiently hazardous that you have to move
15 under this one?

16 Would you have a problem of which section would be
17 applicable?

18 Mr. Jorling. Presumably this would take precedence over the
19 standard, the normal procedure of the issuance of the criteria
20 to achieve that standard, this would take precedence anytime
21 the secretary found a substance, and it could be, the way
22 that the framework is now, if at some time in the future
23 new evidence revealed that there was a substance that he had
24 traeted in the normal framework like sulfur, sulfur oxide
25 which now looked like they were hazardous, he could then impose

1 this requirement, substitute it for the normal ambient air
2 quality standard.

3 So I think any time that there was material evidence
4 available that a substance fell within this category, he could
5 move this route.

6 Senator Muskie. Is there anything more? How about the
7 enforcement? Is that --- that is not this.

8 Mr. Billings. Yes, it is. Subsection (c) of this section
9 provides the use of the imminent substantial and danger authority,
10 similar to that we had in 108(k), on the assumption that
11 prohibition should be met with an injunction.

12 Senator Cooper. The first sentence in (c) I don't understand
13 it. Does it mean that the prima facie, is that fact 1, or
14 does it mean it must be found to be?

15 Mr. Billings. that is a declaration.

16 Senator Muskie. Does that language relate directly to the
17 other language you are referring to that is already in the
18 law?

19 Mr. Jorling. This has been extracted directly from section
20 108(k).

21 Senator Muskie. Let me ask you this: What is the importance
22 of that declaration? Why couldn't you say that "Upon evidence
23 of a violation of any prohibition or emission standards the
24 Secretary shall"? Why do you need the declaration?

25 Mr. Jorling. I think the only purpose I can see is

1 to avoid having that issue raised during the enforcement
2 proceeding in the court, that for purposes of this enforcement
3 proceeding, the statute determines it is a substantial danger
4 and foreclosing that issue to the defendant during the procedure

5 Senator Cooper. Are there precedents for that?

6 Senator Muskie. Why don't you put that in subsection
7 (e)? Why don't you say, "Upon material evidence available
8 that any air pollution agents present an imminent and substantial
9 danger to the health of persons"?

10 I mean the standard that would be an issue in court would
11 be the one set up in this section wouldn't it?

12 Mr. Billings. (b) defines that.

13 Senator Muskie. Then why do you need anything in (c)
14 at all?

15 Senator Baker. Where did you get the last sentence
16 in here, "if supported by substantial evidence, shall be
17 conclusive?"

18 Does that come from some other statute or some other
19 word of art?

20 It is similar to what you have in the Administrative
21 Relief Act.

22 Mr. Jorling. It is basically drawn from the Administrative
23 Procedures Act, as well as some other statutes that give
24 further statement of the weight given to the Secretary's
25 findings in a proceeding in a court challenging that sectorial
judgment.

1 Senator Baker. Mr. Chairman, for whatever it is worth
2 I have always disagreed with the Administrative Procedures
3 Act in this respect and most other acts that deal with review
4 of the Administrative agencies. I think it is appropriate that
5 you have a presumption of correctness on the part of the
6 administrative determinations, but I do not agree with a
7 statutory provision that the determination can be conclusive
8 that almost extinguishes the right of review.

9 Senator Muskie. In other words, you would like to strike
10 the last sentence?

11 Senator Baker. No, I would like to change it to read,
12 "in any such action, the finding of the Secretary under
13 Sections (a) of this section, if supported by substantial
14 evidence" --- no, "of this section shall be presumed correct."

15 Mr. Royce. What was the last you said, "If supported by
16 substantial evidence"?

17 Senator Baker. No, I struck that part. Page 21 would
18 read "The secretary under Section (a) under this section shall
19 be presumed correct, which presumption shall be rebuttable."

20 Senator Muskie. In other words, that gives the Secretary
21 a prima facie case.

22 Senator Baker. It gives the Secretary the first crack
23 at it, but it is a rebuttable presumption.

24 This has nothing to do with air quality. It just has
25 to do with the hang up that I have as a lawyer that I have

always resented the fact that you create a statutory presumption
1 that was conclusive in effect on a showing of any substantial
2 evidence.

3 There is almost always some scintilla of evidence in support
4 of this, and so it is real difficult without any real substance.

5 Senator Cooper. I will raise another question about that.
6 I want to know, again, what the fact of this finding and dec-
7 laration will be. In the first place, I doubt if we can write
8 a statute. We can write the statute, but the Secretary's
9 charges have to be true.

10 The way it is written here, it seems to me the Secretary
11 has found it, and that is proof one --- that his proof would
12 be conclusive anyway. I don't believe the court would hold
13 that.

14 Mr. Jorling. In section 116, which is ahead somewhat,
15 on page 28, this is a blanket review provision through access
16 to the Court of Appeals for any promulgated series of things,
17 including an emission standard or prohibition and that would
18 relate to this question that if a person wants to challenge
19 whether or not the emission standard of prohibition was
20 properly supported, he should challenge the promulgation of
21 that standard of prohibition.

22 Once that prohibition has either succeeded or overcome
23 that challenge, or has not been challenged, the issue of
24 whether or not here the prohibition or standard is necessary
25 to protect the health of persons is one that is not open,

1 especially at the time of enforcement, and the only issue is
2 whether or not there has been in fact a violation of the
3 prohibition, or in the case of emission standards, has been
4 set in the emission standards.

5 I don't really know whether it is essential, but I think
6 that is the theory.

7 Mr. Guard. We are relating this to the 108(k) which is
8 on the bottom of page 26.

9 Mr. Jorling. It is basically the same language, yes, but
10 that does not have --- let me see if I recall.

11 Mr. Guard. That is the Secretary and not the Attorney
12 General, right?

13 Mr. Jorling. That conforms to a change that has been made
14 throughout, that the Secretary can act subject to the direction
15 of the Attorney General.

16 Mr. Billings. Tom, are you suggesting that you substitute
17 imminent and substantial danger shall be hazardous to the
18 health of persons?

19 Mr. Jorling. Yes, and put that in quotes.

20 Senator Baker. Senator Cooper's point is, as I understood
21 it, that we are apparently making a statutory determination
22 of a violation of substantive right, but if we make it clear
23 by performing the language of the new section, putting this in
24 quotation marks and relating one to the other for definition
25 purposes, it would be less difficult.

Senator Muskie. Aren't we setting up two different standards of this class of danger, where in the other section we use the phrase "imminent and substantial danger"?

Here we use the word "hazardous."

What is the difference between the two? Do we have existing law before us?

Mr. Jorling. Yes, we do. I will read the existing language in (k). "Notwithstanding any other provision of this section, the Secretary upon receipt of evidence that a particular pollution source or combination of sources (including moving sources) is presenting an imminent and substantial danger to the health of persons and finding that appropriate state or local authorities have not acted to abate such sources may request the Attorney General to bring suit on behalf of the United States in the appropriate United States District Court to immediately enjoin any contributor to the alleged pollution to stop the emission of contaminants to stop the pollution or take what action is necessary."

Mr. Billings. That appears on page 26 and at the top of page 27.

Senator Muskie. Why isn't it here?

Mr. Billings. We could make that provision. The differences as set forth in the hazardous polluting part is that to get at an emitter of a polluter, whereas this goes to the emergency type of situation that occurred in New York and is currently occurring in Washington, D. C.

Senator Muskie. But that section could be interpreted
1 to cover the kind of pollutants you are trying to cover in
2 section 113, couldn't it?

3 At least this was the argument made in the hearings.

4 Mr. Billings. On an ad hoc basis, you could take this
5 against any polluter at any time.

6 Senator Muskie. You could go to the section at the
7 bottom of page 26 from 113.

8 Mr. Billings. Except on page 26, you would have gone
9 after each individual emitter of asbestos.

10 Senator Muskie. But the point I am driving at is, with
11 respect to the same pollutants, you are using two different
12 standards. I am wondering, does this serve any purpose?

13 Why not use the imminent and substantial over here, instead
14 of hazardous and conform the two sections with respect to that?

15 Is there any problem with that? Would it make it less?

16 Mr. Billings. I --- assuming we could conform the
17 definition.

18 Senator Muskie. Say that upon material evidence any
19 air pollution act presents an imminent substantial danger to
20 the health of persons.

21 Mr. Billings. Yes, and I shall be for the purpose
22 of this section.

23 Senator Muskie. I don't know what you do with the
24 title of this section, then, "Hazardous substances."

25 You could have a definition, saying that a hazardous

1 substance is one that is an imminent and substantial danger.

2 Mr. Jorling. Imminent suggest short time, whereas some
3 of these are very toxic because they affect the second generation.
4 They are a mutagenic or something like that, so that there
5 may be requirements to use the word "or."

6 Senator Muskie. Is anyone else on the committee troubled
7 by the two standards, the existence of the two standards?

8 Senator Baker. I have always been taught I should be.

9 Senator Muskie. Are you troubled by it, John?

10 Mr. Jorling. The origin of the proposal to regulate
11 hazardous substances comes out of the Administrative Procedures
12 Act. They did not have a prohibition. They had simply the
13 setting of emission standards.

14 Senator Muskie. (b) is the definition of (a).

15 Senator Muskie. Maybe we should just change (c) to
16 "hazardous" and not worry about the different standard in that
17 other section?

18 Is that all right? Is that the sense of the committee?

19 Mr. Royce. Mr. Chairman, couldn't we just delete the
20 first sentence of (c) and incorporate section 103(c)
21 by reference, if that is the appropriate section?

22 I have forgotten, but "upon evidence of such violation,
23 the Secretary shall bring a civil suit under paragraph, section,
24 et cetera."

25 Mr. Jorling. Imminent and substantial tests, as I understand

1 it to mean, is for the development of an ad hoc situation
2 such as an air quality emergency in Washington, or New York,
3 where you need emergency authority to go in and it is an imminent
4 situation.

5 You have to have it, whereas this goes after that, but it
6 also goes after substances which may increase mortality in the
7 future sometime through the effect on metabolism, genetics,
8 or what have you.

9 Mr. Billings. Couldn't we by reference use paragraph (6)
10 in the next section as the enforcement authority for this
11 section for any violation of the prohibition of emission
12 standards that it shall be subject to paragraph 14, and that would
13 get around the whole problem, and then they would use their
14 imminent and substantial danger authority to abate violations?

15 Mr. Jorling. I see no problem with that.

16 Mr. Billings. You could solve every problem with the
17 question of parallelism, or something.

18 Senator Muskie. Maybe we could resolve this. That may
19 pose some problems, because then in (a) and (b), you have
20 used : "hazardous substances", and there is nothing in it to
21 relate it to "imminent and substantial danger", and then
22 the enforcement part you are setting a different standard.

23 Mr. Jorling. Could that be overcome by inserting in the
24 section, using page 26 and 27, enforcement authority, presenting
25 an imminent and substantial danger to the health of persons

1 and a hazard to the health of persons established under
2 section whatever the number is ---- 113?

3 Mr. Billings. Going to the point ---

4 Senator Muskie. Or a hazard to the health of persons.

5 Mr. Jorling. For the purpose of section 113.

6 Mr. Billings. You don't want to require the secretary to
7 await state action?

8 Senator Muskie. I guess we are reduced to me. My schedule
9 is chopped into little pieces, so I can't do anything right.

10 Why don't we try that formula?

11 Mr. Billings. All right. We can save that for tomorrow.

12 Senator Muskie. What have we got here? Why don't we
13 assume this has been taken care of by that, and go on to --- what
14 is this federal enforcement thing?

15 Mr. Billings. This is starting on page 21. You will recall,
16 Mr. Chairman, that sometime ago concern was expressed as to
17 what the role of the states would be, so on page 27 of this
18 Act, the staff has developed some language.

19 Senator Muskie. I was talking about page 21.

20 Mr. Billings. I am trying to relate two things. On page
21 27, the staff has developed some language which would provide
22 a relationship between the secretaries of states in relation
23 to air quality standards violations, and in the next print
24 we will have that preceding federal enforcement.

25 Mr. Royce. Section 115?

Mr. Billings. 115 now.

1 Mr. Royce. Yes.

2 Senator Muskie. Will you see that I have a copy of this?

3 Mr. Billings. I will have this typed up which is a summary.

4 Senator Muskie. We make progress slowly.

5 Mr. Royce. Do you want to meet at 1:30 tomorrow, Senator
6 Muskie?

7 Mr. Billings. I thought we were going to meet at two,
8 but then they took away the last half hour.

9 (Whereupon, at 3:20 p.m. the Subcommittee on Air & Water
10 Pollution adjourned, to reconvene at 1:30 p.m., Wednesday,
11 July 29, 1970.)
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